

Upon a detailed review of FR Doc. 04-01133 published January 21, 2004 entitled "Organizational Designation Authorization Procedures", the following comments are herein entered into record opposing the proposed rule. The FAA proposal to allow the designation of critical aviation safety related duties and responsibilities historically accomplished by well trained experienced employees and Aviation Safety Inspectors is not in the best interest of the public, aviation community; or national security for reasons which include but not limited to the following: 1. The FAA currently authorizes approximately 30, 000 designees to a ratio of 2000 active inspectors. The current inspector workforce is underfunded and understaffed to successfully conduct present oversight responsibilities. To expand such designation through the proposed rule part 183 change would further expand the Inspector/Designee ratio degrading the current overworked and overstressed workforce to the detriment of aviation safety. (2) FAA government Inspectors are required by federal rules to be United States citizens. The rule as written would authorize non-citizens to accomplish critical government safety related tasks. A designee evaluated at least one of the 9/11 hijackers killing Americans. (3) The rule would create a "community of tax cheaters." The FAA does not monitor fees charged by designees who are "contractor employees" being controlled and supervised by the FAA. The rule does not establish procedures to ensure taxpayers will not be cheated. The Internal Revenue Service (IRS) has to this authors knowledge never requested the FAA to provide designee information so it can conduct an audit on the millions dollars of designee fees exchanging hands yearly. (4) The proposed rule would expand the current designee program including existing faults in the system. For example, it is well known within the aviation community student pilots will fly their aircraft hundreds of miles to be evaluated by "easy" designees when a designee upholding standards are often housed at the students base of operations. (4) Contrary to comments within the proposed rule, designees are rarely removed for wrong doing. They tend to hire better lawyers to fight such expulsion. (5) The rule as written will place a layer of protection between the Inspector and designee by allowing the designee organization to select the designees under their authority. (6) Rule comments that a designee study was conducted indicating the designee program is working well. That assumption is contrary to reality and perhaps no such study exist since the FAA has not shared the "study" with the public to aid in its comment decision making regarding the proposed rule. (7) The FAA's use of designees was originally intended to allow experienced industry personnel ? who had developed a working trust with FAA inspectors ? to take on basic certification activities. The proposed rule does not gurantee a continued working trust. (8) Administration cost to manage the ODA concept will increase. Presently the FAA, without charge to the designee supply them with material to conduct their evaluations and process their evaluation files. Expanding the designee program as proposed would raise that cost of service. (9) The rule as proposed does not grant authority or funding to Inspectors for reevaluation of designee certified applicants. Attempts to reevaluate applicants have historically been prohibited. There will be no public interest checks and balances as the rule is written. (10) The rule as written is designed to reduce or eliminate organized labor within the FAA inspector work force. The authority within the proposed rule to "expand the designee program without further rule making" would allow wholesale transfer of current tasks performed by the Unionized inspectors to outsourcing organizations who's bottom line is making a profit with public safety a secondary concern.